

From: [Kate Bouve](#)
To: [Greg Loarie](#)
Cc: [Robert Perlis](#)
Subject: RE: Telephone conversation
Date: 01/16/2013 09:12 AM

Greg -

When we talked the other day, you asked if 3rd parties could be intervenors in an EPA admin hearing. I believe the answer is yes provided that.....

I'm not a lawyer, so may I suggest that you contact Bob Perlis, one of the EPA OGC attorneys working on this matter.

His number is 202-564-5636.

Cheers.

Kate Bouvé
703-305-5032

▼ Greg Loarie ---01/14/2013 12:16:15 PM---Hello again, I received late Friday CDPR's response to my request for (1) the "2005 memo," later wit

From: Greg Loarie <gloarie@earthjustice.org>
To: Kate Bouve/DC/USEPA/US@EPA
Date: 01/14/2013 12:16 PM
Subject: RE: Telephone conversation

Hello again,

I received late Friday CDPR's response to my request for (1) the "2005 memo," later withdrawn, in which CDPR recommended restricting SGARs to indoor use, (2) the poisoning incident data currently under review by CDPR, and (3) the draft "data analysis memo" currently out for peer review by UC scientists. All these docs are attached FYI. The conclusion of the data analysis memo is notable:

Based on the data above, DPR finds that use of two of the four second generation anticoagulant rodenticides--brodifacoum and bromadiolone-- present a hazard related to persistent residues in target animals resulting in impacts to non-target wildlife. Because they are similar in half-life and toxicity, DPR also find that if the use of difethialone and difenacoum were

to increase,
rodenticides containing those two second generation anticoagulant rodenticides
may also present
a hazard related to persistent residues in target animals.

Best,

Greg

From: Greg Loarie
Sent: Wednesday, January 09, 2013 1:31 PM
To: Bouve.Kate@epamail.epa.gov
Subject: RE: Telephone conversation

Hello Kate,

It was good to speak with you today. Pasted below is Susan's contact information. I'm also attaching CDFG's most recent letter to CDPR re: second-generation anticoagulants.

Susan E. Kegley, Ph.D., Principal and CEO Pesticide Research Institute
1400 Shattuck Ave, #8
Berkeley, CA 94709
Phone: (510) 705-1874
Fax: (510) 705-1683
E-mail: skegley@pesticideresearch.com
Web: <http://www.pesticideresearch.com>

I will let you know when I receive from CDPR (1) the issue paper they issued in 2005 proposing restrictions on second-gen anticoagulants, and (2) the analysis paper currently under review by UC scientists.

Best regards,

Greg

Gregory C. Loarie

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From: Bouve.Kate@epamail.epa.gov
[mailto:Bouve.Kate@epamail.epa.gov]
Sent: Wednesday, January 09, 2013 12:30 PM
To: Greg Loarie
Subject: Telephone conversation

Greg -

Thanks again for your time this afternoon. I would appreciate receiving contact information for Susan Kegley (sp?), the 2011 Department of Fish and Game letter to DPR, and the DPR report on second generation anticoagulant rodenticides (once you've received it).

I'll also find out if it is EPA practice to allow a third party to be an intervenor in an administrative hearing.

Best wishes

Kate Bouvé
Office of Pesticide Programs
U.S. EPA
703-305-5032[attachment "2005 memo Shelgren to Cortzez.pdf"]

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Bouve/DC/USEPA/US] [attachment "draft data analysis memo 9-19-
12.pdf" deleted by Kate Bouve/DC/USEPA/US]